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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

EPIC GAMES, INC.,
 Plaintiff, Counter-defendant
 v.
 APPLE INC.,
 Defendant, Counterclaimant.

Case No. 4:20-cv-05640-YGR
 Case No. 4:11-cv-06714-YGR
 Case No. 4:19-cv-03074-YGR

**DECLARATION OF JAY P. SRINIVASAN IN
 SUPPORT OF DEFENDANT APPLE INC.'S
 RESPONSE TO NON-PARTY EPIC GAMES,
 INC.'S MOTION FOR ADMINISTRATIVE
 RELIEF TO ACCESS SEALED FILINGS IN
 RELATED CASES**

IN RE APPLE IPHONE ANTITRUST
 LITIGATION

Hon. Yvonne Gonzalez Rogers

DONALD R. CAMERON, *et al.*,
 Plaintiffs
 v.
 APPLE INC.,
 Defendant.

DECLARATION OF JAY P. SRINIVASAN IN SUPPORT OF DEFENDANT APPLE INC.'S RESPONSE TO NON-
 PARTY EPIC GAMES, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO ACCESS SEALED FILINGS IN
 RELATED CASES

Pursuant to Civil Local Rule 7-5, I hereby declare as follows:

1. I am an attorney licensed to practice in the State of California, and a member of the Bar of this Court. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Apple Inc. ("Apple") in this case. I have personal knowledge of the facts stated below and, if called as a witness, I could and would testify competently thereto. I submit this declaration in support of Apple's Response to Non-Party Epic Games, Inc.'s ("Epic") Motion for Administrative Relief to Access Sealed Filings in Related Cases.

2. On July 15, 2021, I participated in a telephonic meet and confer with Epic's counsel regarding Epic's demands for access to sealed filings and continued productions of documents in the pending class actions. During that discussion, Epic's counsel stated that Epic may use any additional materials it receives to potentially admit additional exhibits to the record in the *Epic* case, to amend Epic's proposed findings of fact, or to challenge a judgment entered against it.

3. Epic is currently an opt-out plaintiff in *In Re Google Play Store Antitrust Litigation*, Case No. 3:21-md-02981. On August 20, 2021, Defendants Google LLC, Google Payment Corp., Google Ireland Ltd., Google Commerce Ltd., and Google Aci Pacific Pte. Ltd. (collectively, "Google") filed an emergency motion to stay an August 18, 2021 order of the court that denied motions to seal portions of the complaints filed in the litigation. A true and correct copy of Google's motion is attached to this declaration as Exhibit A.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on August 24, 2021, at Los Angeles, California.

DATED: August 24, 2021

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Jay P. Srinivasan
Jay P. Srinivasan

Attorney for Defendant Apple Inc.